

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25–10068 (CTG)

(Jointly Administered)

Related to D.I. 1674

**SUPPLEMENT TO FINAL FEE APPLICATION OF KELLEY DRYE & WARREN LLP
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS LEAD COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
PERIOD FROM JANUARY 30, 2025 THROUGH AND INCLUDING JULY 16, 2025**

Kelley Drye & Warren LLP (“Kelley Drye”), as lead counsel to the Official Committee of Unsecured Creditors (the “Committee”) of *Joann, Inc., et al.*, the pre-Effective Date debtors and debtors-in-possession (the “Debtors”), hereby submits this supplement (this “Supplement”) to its *Final Fee Application of Kelley Drye & Warren LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Lead Counsel to the Official Committee of Unsecured Creditors for the Period From January 30, 2025 Through And Including July 16, 2025* (the “Application”),² and respectfully represents as follows:

1. By the Application, Kelley Drye requested final approval of \$2,672,272.50 (the “Final Fee Request”) in fees incurred for the period from January 30, 2025 through and including July 16, 2025 (the “Application Period”), plus \$23,068.33 of reimbursable expenses incurred during the Application Period (the “Final Expense Request”). The Final Fee Request

¹ The Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

² See Docket No. 1674. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

included \$25,000 in estimated fees and expenses incurred or to be incurred following the Application Period in connection with preparing the Application and attending any associated hearing (the “Additional Fee Estimate”).

2. Kelley Drye now submits this Supplement to the Application in advance of the hearing with respect to the Additional Fee Estimate. As reflected in the invoices attached hereto as Exhibit A, Kelley Drye incurred \$21,328.00 in fees following the Application Period in connection with preparing the Application, which is \$3,672.00 less than the Additional Fee Estimate.

3. Accordingly, by this Supplement, Kelley Drye seeks to decrease the Final Fee Request by \$3,672.00 to \$2,668,600.50. The Final Expense Request remains \$23,068.33. As a result, Kelley Drye seeks allowance of \$2,691,668.83 on a final basis for services rendered and reimbursement of expenses incurred. Kelley Drye reserves all rights to further supplement the Application to the extent Kelley Drye incurs additional fees or expenses in connection with the Application.

4. Kelley Drye believes that the time entries attached hereto are in compliance with the requirements of Local Rule 2016-2.

WHEREFORE, Kelley Drye requests that the Court enter an order approving: (i) final allowance of compensation for necessary and valuable professional services rendered to the Committee in the sum of \$2,668,600.50 and reimbursement of actual and necessary expenses incurred in the sum of \$23,068.33; (ii) payment of the difference between the amounts allowed and any amounts previously paid pursuant to the Interim Compensation Order; and (iii) such other relief as this Court may deem just and proper.

Dated: September 24, 2025

KELLEY DRYE & WARREN LLP

/s/ Jason R. Adams

Eric R. Wilson (admitted *pro hac vice*)

Jason R. Adams (admitted *pro hac vice*)

Maeghan J. McLoughlin (admitted *pro hac vice*)

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